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*Counsel for Emilio Jose Heredia Collado*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMILIO JOSE HEREDIA COLLADO,

Defendant.

Case No. 21-cr-00109-CRB

**PARTIES' STIPULATION AND  
PROPOSED ORDER FOR RELEASE  
OF PASSPORTS TRAVEL TO  
MEXICO**

Defendant Emilio Heredia having been sentenced on August 10, 2023, to a term of probation without a term of incarceration, the parties hereby stipulate that the Conditions of Release entered by the Court on March 23, 2021 (Dkt. No. 7) should be terminated and that defense counsel may release Mr. Heredia's U.S. and Mexican passports to Mr. Heredia without further limitation.

The parties further stipulate that during his term of probation Mr. Heredia may travel to Mexico with advance approval of his probation officer and without the necessity of an additional court order. This stipulation has been approved by U.S. Probation Officer Kristen Coleman.

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Dated: January 2, 2024

/s/ Ted W. Cassman  
Ted W. Cassman  
Counsel for Emilio Heredia

Dated: January 2, 2024

/s/ Matthew F. Sullivan  
Matthew F. Sullivan  
Trial Attorney  
Criminal Division  
U.S. Department of Justice

## PROPOSED ORDER

Pursuant to the parties' stipulation and good cause appearing, it is hereby ORDERED that defendant's Conditions of Release are hereby terminated and that defense counsel may release Mr. Heredia's U.S. and Mexican passports to Mr. Heredia without further limitation.

Dated: January \_\_, 2024

Hon. Sallie Kim  
U.S. Magistrate-Judge